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August 28, 2020

VIA ECF ONLY

Honorable Magistrate Judge Anne Y. Shields
United States District Court for
The Eastern District of New York
Courtroom 830
100 Federal Plaza
P.O. Box 830
Central Islip, NY 11722

RE: *Rajwinder Kaur v. Equifax, Inc., et al.*
U.S. District Court, Eastern District of New York (Central Islip)
Case No. 2:20-cv-02614-JS-AYS

Dear Magistrate Shield:

Counsel for Defendant Trans Union, LLC (“Trans Union”), Experian Information Solutions, Inc. (“Experian”) and Equifax Information Services, LLC (“Equifax”) and pro se Plaintiff Rajwinder Kaur submit the attached Joint Letter, pursuant to this Court’s Order of July 30, 2020 [Doc. No. 18].

1. **Case Name:** Rajwinder Kaur v. Equifax, Inc., et al.
2. **Basis For Federal Jurisdiction:** Federal Question – Plaintiff’s allegations are brought under 15 U.S.C. § 1681, et seq. and 28 U.S.C. § 1331.
3. **Status Of Service:** All Defendants have been served and all Defendants have responded to Plaintiff’s Complaint. See Doc. Nos. 12, 16 and 19.
4. **Counterclaims and Crossclaims:** There are no counterclaims or crossclaims pending in this matter.
5. **Plaintiff’s Statement of Facts:** Pursuant to the Fair Credit Reporting Act (or, “FCRA”), Plaintiff requested full file disclosure of the consumer file held by each of the defendants. None of the defendants provided Plaintiff with the requested information. Plaintiff also requested all defendants to conduct an investigation of numerous accounts to ensure accurate reporting on Plaintiff’s credit report. Some accounts were removed, however, many were not removed. Despite numerous written requests for investigation and reinvestigation results, and procedures used to obtain information by furnishers of

information, all defendants failed to provide Plaintiff with the information requested, as required under the FCRA. Plaintiff informed all defendants that Plaintiff intended on seeking claims for violations of the FCRA, for non-compliance. Defendants refused to comply with Plaintiff's requests. Consequently, Plaintiff was forced to file this action.¹

6. **HIPAA Compliance:** N/A.
7. **Informal Exchange of Paper Documents:** The parties agree to exchange initial documents related to Plaintiff's claims no later than November 6, 2020.

Plaintiff states that she seeks the full consumer file disclosure from each defendant, results of investigations and documentation of procedures used by each defendant in verifying the alleged obligations of Plaintiff from each furnisher of information. Plaintiff also seeks reinvestigation documentation, procedures and results of said reinvestigation(s) for each and every account defendants did not delete or remove from credit reporting. Plaintiff proposes that defendants provide Plaintiff with the discovery production of documents no later than November 6, 2020.

Defendants agree to treat Plaintiffs' request herein as a document request pursuant to Rule 34 of the FRCP and respond accordingly by November 6, 2020. Defendants further state that a protective order will be required for the exchange of confidential information.

8. **Joint Status Letter And Telephone Status Conference:** The parties suggest that a follow up status Letter be submitted by December 1, 2020 and a telephone status conference by early January 2021.
9. **Electronically Stored Information:** The parties do not believe that this case is suitable for electronic discovery, but is amenable to producing any electronically stored information in hard copy as an initial matter. Once the parties have had the opportunity to review such documents, the parties agree, if necessary, to confer regarding any additional exchange or production that the parties believe is necessary.

CASE MANAGEMENT PLAN:

Pro Se Plaintiff's written statement of facts: October 15, 2020.

Defendant's written statement of facts: November 16, 2020.

Deadline to Amend Pleadings or Add Parties: November 30, 2020.

¹ Defendants deny Plaintiff's allegations.

Discovery Deadline: March 1, 2021.

Pro Se Plaintiff's revised written statement of facts: April 1, 2021.

Dispositive Motion Deadline: May 3, 2021.

Parties Submission of Final Pre-trial Order: June 4, 2021, if no dispositive motion is filed.

Date: August 28, 2020

Respectfully submitted,

/s/Camille R. Nicodemus

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Experian Information Solutions, Inc.

By: /s/ *Rajwinder Kaur*

Rajwinder Kaur

Plaintiff, in *pro per*

Without prejudice